

EXHIBIT A

12 | VIDEOTAPED 30(b)(6) DEPOSITION OF

13 JOHN M. LOCKWOOD, M.D.

14 Volume I

15 (Taken by Defendant Abbott Laboratories Inc.)

16 April 23, 2009

17 9:27 a.m.

18 | Suite 800

1420 Peachtree Street, N.E.

20 Atlanta, Georgia

21 Reported by: F. Renee Finkley, RPR, CRR, CLR,

22 CCR-B-2289

1 Q. And before that, when there were just
2 paper catalogs, could you -- for example, could you
3 go to a trade show and get the McKesson catalog?

4 A. Well, you could talk to the McKesson rep
5 at a trade show and they would send you one,
6 certainly. Yes. I mean, it's -- you had to be --
7 they didn't hand them out to just anybody. You had
8 to be a qualified purchaser and meet the requirements
9 of being a qualified purchaser. And you typically
10 had to give them your information or they had to have
11 your information, your DEA number, phone number,
12 address, who your pharmacist was, those sorts of
13 things. I, you know --

14 Q. Could I have called up -- I mean, I know
15 this calls for a bit of speculation, but based on
16 your understanding of the circumstances and
17 requirements, could I have called up McKesson and
18 gotten a catalog?

19 A. Only if you were willing to represent that
20 you were a licensed pharmacy illegally and send them
21 your false DEA number and -- and misrepresent
22 yourself; otherwise, as I said -- I think I just

1 testified to -- you would have to be a -- I guess I'm
2 looking for the right word, but a qualified
3 purchaser, that you had to be a pharmacy with, you
4 know, an address and all of those things.

5 And the McKesson rep usually came to Key
6 West as I think I recall about once a month,
7 ballpark. They'd walk by our office. They knew we
8 were there and where we were. But no, you as an
9 attorney, if you don't have a pharmacy license and
10 all the other things that go along with that, you
11 could not get the catalog.

12 Q. And at some point you provided a -- I may
13 be confusing programs. I apologize if I am. But did
14 you provide a copy of Econolink to the federal
15 government?

16 A. Yes, sir, we did.

17 Q. When did you do that?

18 A. I may want to recheck the date, but it was
19 either January 18th, 2001 or January 19th, 2001. We
20 were in Boston doing a presentation to them and
21 that's when we gave it to them. Yeah.

22 Q. And did you seek McKesson's permission to